

GROOM LAW GROUP, CHARTERED
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Lonie A. Hassel
Special Employee Benefits Counsel for Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
DELPHI CORPORATION, <u>et al.</u>,	: Case No. 05-44481 (RDD)
Debtors.	: (Jointly Administered)
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**MOTION FOR ENLARGEMENT OF TIME TO FILE
THE FINAL FEE APPLICATION OF GROOM LAW GROUP, CHARTERED**

Groom Law Group, Chartered ("Groom") requests issuance of an order enlarging the time within which Groom can file its final fee application and treating Groom's final fee application filed on January 4, 2010 as timely filed. In support of this motion, Groom represents:

1. Groom has been retained by the Debtors as special employee benefits counsel and has provided necessary and timely legal services since the beginning of this bankruptcy case.
2. Pursuant to this Court's order dated July 30, 2009, approving modifications to the First Amended Joint Plan of Reorganization ("Plan Modification Order"), final fee applications seeking professional fees and reimbursement of expenses were due on the last day of the second full month after the Effective Date of the modified reorganization plan ("Modified Plan").
3. On or about October 14, 2009, Groom received a notice entitled, "Notice of (A) Order Approving Modifications to First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-In-Possession and (B) Occurrence of Effective Date" (capitalization removed). The title of the notice did not indicate that it contained information on certain bar dates, and the language towards the end of the notice stating that the final requests seeking professional fees and reimbursement of expenses must be filed no later than December 31, 2009 was missed by the Groom attorney and staff that handled the notice. Groom believes that its failure to notice the deadline to file the final fee application was due to excusable neglect.
4. Upon discovering on January 4, 2010 that final fee applications were due on December 31, 2009, Groom has immediately prepared and filed the final fee application on January 4, 2010.

Based on the representations above, Groom respectfully requests issuance of an order enlarging the time within which Groom can file its final fee application and treating Groom's final fee application filed on January 4, 2010 as timely filed.

Dated: Washington, D.C.
January 4, 2010

Respectfully submitted,

/s/ Lonie A. Hassel
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